Department of Homeland Security
U.S. Citizenship & Immigration Services

Small Entity Analysis for the U.S. Citizenship and Immigration Services Fee
Schedule NPRM

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Introduction

The U.S. Citizenship and Immigration Services (USCIS), as a U.S. Government agency primarily funded by user fees, periodically revisits whether its fees are adequate to appropriately fund its operations. In advance of a potential revision to the fees it levies, USCIS has reviewed the fees that would potentially affect small entities as defined by Small Business Administration (SBA) guidelines and in accordance with the Regulatory Flexibility Act (RFA).

A small entity can have the same meaning as a small business, a small organization, and a small governmental jurisdiction.[1] The term "small business" has the same meaning as the term "small business concern" under section 3 of the Small Business Act, unless an agency, after consulting with the SBA's Office of Advocacy and after opportunity for public comment, establishes one or more definitions of such term which are appropriate to the activities of the agency and publishes such definition(s) in the Federal Register.[2] In addition:

- A "small business":
    - is organized for profit,
    - has a place of business in the United States,
    - operates primarily within the United States or makes a significant contribution to the U.S. economy through payment of taxes or use of American products, materials, or labor,
    - is independently owned and operated, and
    - is not dominant in its field on a national basis.[3]
- A "small organization" is any not-for-profit enterprise which is independently owned and operated and is not dominant in its field, unless an agency establishes, after opportunity for public comment, one or more definitions of such term which are appropriate to the activities of the agency and publishes such definition(s) in the Federal Register.[4]
- A "small governmental jurisdiction" includes governments of cities, counties, towns, townships, villages, school districts, or special districts, with a population of less than 50,000, unless an agency establishes, after opportunity for public comment, one or more definitions of such term which are appropriate to the activities of the agency and which are based on such factors as location in rural or sparsely populated areas or limited revenues due to the population of such jurisdiction, and publishes such definition(s) in the Federal Register.[5]

According to SBA, for most industries a small business may be defined either in terms of the average number of employees over the past 12 months or the average annual receipts over the past 3 years.[6]

A majority of the immigration benefit petitions are submitted by individuals who do not meet the definition of "entity" under SBA rules. Entities affected by this rule are those that file

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[1] The RFA in a Nutshell, page 18: https://www.sba.gov/sites/default/files/advocacy/RFA_in_a_Nutshell2010.pdf.
[2] Ibid.
[3] SBA small entity definition: https://www.sba.gov/content/am-i-small-business-concern.
[4] The RFA in a Nutshell, 18.
[5] Ibid.
[6] SBA size standards table: https://www.sba.gov/sites/default/files/files/Size_Standards_Table.pdf.

and pay fees for certain immigration benefit petitions on behalf of a foreign national. The petitions or applications filed by entities include the following:

- Petition for a Nonimmigrant Worker, Form I-129 – authorizes foreign workers for temporary employment, services, or to receive training in the United States.
- Immigrant Petition for Alien Worker, Form I-140 – authorizes foreign workers to become permanent residents in the United States.
- Application for Civil Surgeon Designation, Form I-910 – authorizes physicians to become designated providers of medical exams for individuals in the United States applying for immigration benefits with USCIS.
- Application for Regional Center Designation Under the Immigrant Investor Program, Form I-924[7] – authorizes designation as a Regional Center under the Immigrant Investor Program.

The goal of this review was to analyze the economic impact of a proposed fee change by USCIS on small entities. The four forms mentioned above represent those entities that petition or file on behalf individuals and therefore, were the focus of this analysis. Form I-129 and Form I-140 comprised the vast majority of the petitions applicable to this study. Other fees pertinent to small entities are those collected for Form I-910 and Form I-924.

Sources and Sample Methodology

Forms I-129, I-140, and I-910

USCIS obtained petitioner data filed for Forms I-129 and Form I-140 from internal databases between September 1, 2014 to August 31, 2015 and data for Form I-910 between August 1, 2014 and July 31, 2015.[8] This petitioner data included the employer identification number, firm name, city, state, ZIP code, number/type of filing, and petitioner or beneficiary name.

USCIS devised a methodology to conduct the small entity analysis based on a representative sample of the potentially impacted population. To create and test a sample, we followed this approach:

- We aggregated a working database for each form type comprised of records from unique Employer Identification Numbers (EIN) submitted with petitions and unique petitioner names from petitions that did not include an EIN. This list then was treated as the population from which the sample was taken.
- Sample size was determined using a standard statistical formula of the population total for each form type with a 95 percent confidence level and a 5 percent confidence interval.[9]

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[7] Supplemental Form I-924A (Supplement to Form I-924) is captured in this dataset.
[8] USCIS, Office of Performance and Quality.
[9] What this means is that there is a 95 percent chance that parameters descriptive of the population (e.g. the percent of entities that are small) are no more than 5 percent different from the statistic obtained by the sample.

- Once we determined the sample size, we selected a random sample from the population by assigning a randomly generated identification (ID) number to each record. We then sorted the population so the entities with the smallest random ID numbers would be selected as sample entities.

Filing data did not include information needed to classify the entity according to size standards, such as revenue or number of employees, so we used third party sources to obtain this information. For the analysis of the effects on Forms I-129, I-140, and I-910, we used several data sources to capture information on the characteristics of entities required to pay these fees.

- Hoover's online database of U.S. entities, a subscription service of Dun & Bradstreet
    - http://www.hoovers.com/
- Open-access (free) databases of public and private entities
    - http://www.cortera.com/
    - http://www.manta.com/
    - http://www.guidestar.org/

From these sources, USCIS determined the North American Industry Classification System (NAICS) code,[10] revenue, and employee count for each entity in the sample. A list of NAICS codes for each entity matched in Forms I-129, I-140, and I-910 can be found in Appendix A, along with the SBA threshold for each industry cluster. In order to determine an entity's size, USCIS first classified each entity by its NAICS code, and then used the SBA size standards to compare the requisite revenue or employee count threshold for each entity. Based on the NAICS code, some entities are classified as small based on their annual revenue and some based on the number of employees. In cases where the matched entity was a direct subsidiary, we recorded data for the parent organization. In cases where the entity was a single-location franchise, we recorded the single location's data. Very few government entities submitted petitions in our sample, and we were not able to match any of these entities with revenue or employment data.

Once as many entities as possible were matched, those that had relevant data were compared to the size standards provided by the SBA to determine whether they were small or not. Those that could not be matched or compared were assumed to be small under the presumption that non-small entities would have been identified by one of the databases at some point in their existence.

Form I-924

Data for Form I-924 was treated differently than the data for Forms I-129, I-140, and I-910 in this analysis. Although applicant data for Form I-924 was available for analysis, difficulties in identifying entities and obtaining revenue and employee count due to the structure of these entities made it difficult to conduct a meaningful analysis. The structure of these entities and issues with data are discussed further in this analysis.

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[10] U.S. Census Bureau, NAICS code listing: http://www.census.gov/eos/www/naics/.

Petition for a Nonimmigrant Worker, Form I-129 Data

Research Population and Sampling Statistics

USCIS internal data for Form I-129 were provided by the Office of Performance and Quality (OPQ) from the Computer-Linked Application Information Management System (CLAIMS3)/Citizenship and Immigration Services Common Operational Repository (CISCOR) database. There were 482,190 foreign worker Form I-129 petitions submitted from September 2014 to August 2015. Of these, 476,210 (98.6 percent) were submitted with an EIN, also known as a petitioner tax number; the remaining 5,980 were recorded with a blank EIN field.

Many employers submitted more than one petition over the course of the year. Those petitions that were submitted with an EIN provided 84,490 unique EINs. We assumed that entities in the population with no information listed for the EIN could be small or not. These entities were removed before the sample was selected for this analysis.

Data from the 12-month period submissions of I-129 petitions were pooled to create a population of 482,190 foreign worker petitions. These represented a population of 84,490 entities petitioning for workers, with many of these entities submitting multiple petitions. From this population, we drew a random sample of 534 petitioning entities. Using the subscription or public-use databases identified previously, we assembled revenue and employment information on these entities and determined that 444, or 83.1 percent, of these petitioners met the definition of small entities. Of those that we determined could be classified as small entities, over half had annual revenues of less than a million and approximately 9 percent of them had petitioned for four or more workers over that year.

Table 1: Outline of Form I-129 Statistics (September 2014 – August 2015)			
Parameter	**Quantity**	**Proportion of Sample**	**Comments**
Population—petitions	482,190	-	Total number of petitions.
Population—unique entities	84,490	-	Overstated number of unique employers.
Minimum Required Sample	382	-	Sample size necessary to achieve confidence goals.
Selected Sample	534	100.0%	Sample selected to match 382 entities.
Non-matched Sample Segment (S)	<u>130</u>	24.3%	Entities without data in Hoover's, Manta.com, or Cortera.com.
Matched Sample Segment	404	75.7%	Entities matched in Hoover's, et al, from 534 searches. This exceeds the established sample goal of 382.
Sub-Sample Missing Data (S)	<u>27</u>	5.1%	Entities among the 404 matches lacking revenue or employee count data.
Matched Small Entities (S)	<u>287</u>	53.7%	Matched entities among 404, small entities based on revenue or employee data.
Matched Non-small Entities	90	16.9%	Number of non-small entities out of the 404 matches.
Number of small entities discovered in research	**444**	**83.1%**	<u>130</u> + <u>27</u> + <u>287</u> = **444**

Within the sample, nearly two-thirds of entities had submitted just one petition in the 12-month timeframe; over 77 percent submitted only one or two petitions. At the other end of the scale, less than 7 percent of entities submitted more than 10 petitions.

Table 2: Total Form I-129 Petitions per Entity				
Petitions per Entity	**Entity Count**	**Cumulative Entities**	**Percentage of Sample**	**Cumulative Percentage**
1	334	334	62.5%	62.5%
2	80	414	15.0%	77.5%
3	31	445	5.8%	83.3%
4	20	465	3.7%	87.1%
5	11	476	2.1%	89.1%
6	8	484	1.5%	90.6%
7	7	491	1.3%	91.9%
8	4	495	0.7%	92.7%
9	4	499	0.7%	93.4%
10 - 514	35	534	6.6%	100.0%
Total	**534**		**100.0%**	

When small and non-small entities are treated separately, the distributions are very different. More than 88 percent of identified or assumed small entities submitted three or fewer petitions, whereas only about 58 percent of non-small entities did. Looked at another way, submitting four or more petitions would put a company in the top 10 percent of most active small entities but by comparison, a non-small entity would have to have submitted between 11 to 20 or more petitions to be in the top 10 percent. Although the number of petition counts per entity ranged from 1 to 514, the majority of small entities submitted only one petition while the majority of non-small entities submitted three or more petitions. So, while a large majority of the entities submitting petitions are considered small, most of these entities file very few petitions. A full table is in Appendix B.

Table 3: Form I-129 Petitions per Entity, Non-small and Small						
	Non-small Entities			**Small Entities**		
Petitions per Entity	**Entities**	**Percentage of Total**	**Cumulative Percentage**	**Entities**	**Percentage of Total**	**Cumulative Percentage**
1	27	29.7%	29.7%	307	69.3%	69.3%
2	17	18.7%	48.4%	63	14.2%	83.5%
3	9	9.9%	58.2%	22	5.0%	88.5%
4	6	6.6%	64.8%	14	3.2%	91.6%
5	2	2.2%	67.8%	9	2.0%	93.5%
6 to 10	12	13.2%	81.1%	15	3.4%	96.8%
11 to 20	7	7.7%	88.9%	6	1.4%	98.2%
21 to 50	4	4.4%	93.3%	8	1.8%	100.0%
51+	6	6.6%	100.0%	0	0.0%	100.0%
Total	90	100.0%		444	100.0%	

The distribution of annual revenues of matched small entities in the sample is weighted toward the low end: the majority of these entities reported revenues of less than $1 million per year and almost three quarters brought in less than $5 million. At the lowest end, a little more than 8 percent of entities with records in Hoover's and Manta had revenue of less than $100,000 per year.[11]

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[11] Numbers reported in Hoover's were point figures; those reported in Cortera and Manta were range estimates.

Table 4: Form I-129 Revenue Distribution of Matched Small Entities

Revenue Range of Matched Small Entities	Identified in Hoover's	Identified via Manta, Cortera, or Guidestar	Total	Percentage	Cumulative Percentage
< $100K	23	1	24	8.4%	8.4%
$100K to < $500K	84	8	92	32.1%	40.4%
$500K to < $1M	27	12	39	13.6%	54.0%
$1M to < $5M	52	4	56	19.5%	73.5%
$5M to < $10M	29	3	32	11.1%	84.7%
$10M to < $50M	32	2	34	11.8%	96.5%
$50M to < $100M	0	1	1	0.3%	96.9%
>= $100M	6	0	6	2.1%	99.0%
Missing revenue data*	3	0	3	1.0%	100.0%
Total	**256**	**31**	**287**	**100.0%**	

*Some entities found in the databases either did not contain revenue data or were determined to be small based on employee count thresholds.

The plurality of petitions in the sample were submitted by entities in California, with 108 (or 20.2 percent of 534), followed by New York, Texas, Florida and New Jersey. Together, these top five states accounted for 291 petitions—more than half of the sample.

Table 5: Form I-129 Geographic Distribution of Petitions in Sample, Top 10 States

Rank	State	Number of Petitions	Proportion of Sample
1	CA	108	20.2%
2	NY	63	11.8%
3	TX	54	10.1%
4	FL	42	7.9%
5	NJ	24	4.5%
6	IL	21	3.9%
7	VA	20	3.7%
8	MA	16	3.0%
9	GA	15	2.8%
10	NC	15	2.8%

Discussion of Impacts

USCIS is proposing a $460 fee for the Form I-129, a 42 percent increase. Current fees for this form are $325, meaning the proposed increase would add $135 in fees per petition. In order to calculate the impact of this increase, USCIS estimated that the total costs associated with

the proposed fee increase for each entity, divided by sales revenue of that entity.[12,13] Since entities can file multiple petitions, the analysis considers the number of petitions submitted by each entity. Entities that were considered small based on employee count with missing revenue data were excluded. Among the 284 small entities with reported revenue data, all experienced an economic impact of considerably less than 1 percent with the exception of one entity. The small entity with an impact greater than 1 percent filed a large number of petitions with a low reported revenue. The greatest economic impact imposed by this fee change totaled 2.55 percent and the smallest totaled 0.0001 percent. The average impact on all 284 small entities with revenue data was 0.08 percent. The evidence suggests that the additional proposed fee imposed by this rule does not represent a significant economic impact on these entities.

Issues with Data

In selecting a sample, we want to be as inclusive as possible of all petitioners. However, due to peculiarities in the database, some petitioners would necessarily be entered multiple times in the random sort. Some of this is due to error. For example, Cognizant Technology Solutions' petitions were recorded with 34 different variations of its EIN. Some of these variations featured digits that were transposed and others mis-keyed, while other petitions for this entity were submitted without an EIN.

Manual data-cleaning is impractical in a situation where hundreds of thousands of records must be sorted; worse, it could lead to introducing new inaccuracy into the database if some duplicates are removed and others are not. Using employer names is not a better solution, as there is even less consistency in their formatting.

To our judgment, the data errors that may lead to overrepresentation of some petitioners do not clearly favor either small or non-small entities. The best we can do is to construct a sample larger than necessary, eliminate any duplicates *within that sample*, and proceed with the analysis as normal. There were no duplicates detected within the sample, indicating that irregularities in the data received were not large enough as to skew our understanding of the underlying parameters of the petitioner population.

Immigrant Petition for Alien Worker, Form I-140 Data

Research Population and Sampling Statistics

USCIS internal data for Form I-140 were provided by the OPQ from the CLAIMS3/CISCOR database. There were 101,245 foreign worker Form I-140 petitions submitted from September 2014 to August 2015. Of these, 88,591 (87.5 percent) were submitted with an EIN; the remaining 12,654 were recorded either with a blank or a "0" in the EIN field. Many employers submitted more than one petition over the course of the year, as each petition is

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[12] Total Impact to Entity = (Number of Petitions X $135)/Entity Sales Revenue.
[13] USCIS used the lower end of the sales revenue range for those entities where ranges were provided.

for an individual worker. Those petitions that were submitted with an EIN provided 23,284 unique EINs.

Data from the 12-month period submissions of I-140 petitions were pooled to create a population of 101,245 foreign worker petitions. These represented a population of 23,284 entities petitioning for workers, with many of these entities submitting multiple petitions. From this population, we drew a random sample of 514 petitioning entities. Using the subscription or public-use databases identified previously, we assembled revenue and employment information on these entities and determined that 393, or 76.5 percent, of these petitioners met the definition of small entities, that over half of these small entities had annual revenues of less than $5 million, and that approximately 9 percent of them had petitioned for five or more workers over that year.

Table 6: Outline of Form I-140 Statistics (September 2014 – August 2015)			
Parameter	**Quantity**	**Proportion of Sample**	**Comments**
Population—petitions	101,245	-	Total number of petitions.
Population—unique entities	23,284	-	Overstated number of unique employers.
Minimum Required Sample	378	-	Sample size necessary to achieve confidence goals.
Selected Sample	514	100.0%	Sample selected to match 378 entities.
Non-matched Sample Segment (S)	<u>84</u>	16.3%	Entities without data in Hoover's, Manta.com, or Cortera.com.
Matched Sample Segment	430	83.7%	Entities matched in Hoover's, et al, from 514 searches. This exceeds the established sample goal of 378.
Sub-Sample Missing Data (S)	<u>19</u>	3.7%	Entities among the 430 matches lacking revenue or employee count data.
Matched Small Entities (S)	<u>290</u>	56.4%	Matched entities among 430, small entities based on revenue or employee data.
Matched Non-small Entities	121	23.5%	Number of non-small entities out of the 430 matches.
Number of small entities discovered in research	**393**	**76.5%**	<u>84</u> + <u>19</u> + <u>290</u> = **393**

Within the sample, nearly two-thirds of entities had submitted just one petition in the 12-month timeframe; over 79 percent—very close to the proportion of small entities—submitted only one or two petitions. At the other end of the scale, about 5 percent of entities submitted more than 10 petitions.

Table 7: Total Form I-140 Petitions per Entity				
Petitions per Entity	Entity Count	Cumulative Entities	Percentage of Sample	Cumulative Percentage
1	340	340	66.1%	66.1%
2	68	408	13.2%	79.4%
3	28	436	5.4%	84.8%
4	16	452	3.1%	87.9%
5	16	468	3.1%	91.1%
6	8	476	1.6%	92.6%
7	4	480	0.8%	93.4%
8	5	485	1.0%	94.4%
9	2	487	0.4%	94.7%
10 - 59	27	514	5.3%	100.0%
Total	**514**		**100.0%**	

When small and non-small entities are treated separately, the distributions are very different. Approximately 90 percent of identified or assumed small entities submitted four or fewer petitions, whereas only about 84 percent of non-small entities did. Looked at another way, submitting <u>four</u> or more petitions would put a company in the top 10 percent of most active small entities but by comparison a non-small entity would have to have submitted between 6 to 10 or more petitions to be in the top 10 percent. Although the number of petition counts per entity ranged from 1 to 59, the majority of small entities submitted only one petition. This leads us to believe that most of the small entities file fewer petitions. The full table is in Appendix C.

Table 8: Form I-140 Petitions per Entity, Nonsmall and Small						
Petitions per Entity	Nonsmall Entities			Small Entities		
	Entities	Percentage of Total	Cumulative Percentage	Entities	Percentage of Total	Cumulative Percentage
1	74	61.2%	61.2%	266	67.7%	67.7%
2	15	12.4%	73.6%	53	13.5%	81.2%
3	8	6.6%	80.2%	20	5.1%	86.3%
4	5	4.1%	84.3%	11	2.8%	89.1%
5	6	5.0%	89.3%	10	2.5%	91.6%
6 to 10	7	5.8%	95.0%	16	4.1%	95.7%
11 to 20	4	3.3%	98.3%	9	2.3%	98.0%
21 to 50	1	0.8%	99.2%	8	2.0%	100.0%
51+	1	0.8%	100.0%	0	0.0%	100.0%
Total	121	100.0%		393	100.0%	

The distribution of annual revenues of matched small entities in the sample is weighted toward the low end: the majority of these entities reported revenues of less than $5 million per year and about three quarters brought in less than $10 million. At the lowest end, more than 26 percent of the firms with records in Hoover's and Manta had revenue of less than $500,000 per year.[14]

Table 9: Form I-140 Revenue Distribution of Matched Small Entities					
Revenue Range of Matched Small Entities	Identified in Hoover's	Identified via Manta, Cortera, or Guidestar	Total	Percentage	Cumulative Percentage
< $100K	5	1	6	2.1%	2.1%
$100K to < $500K	57	20	77	26.6%	28.6%
$500K to < $1M	23	7	30	10.3%	39.0%
$1M to < $5M	47	19	66	22.8%	61.7%
$5M to < $10M	27	3	30	10.3%	72.1%
$10M to < $50M	36	8	44	15.2%	87.2%
$50M to < $100M	3	4	7	2.4%	89.7%
>= $100M	19	8	27	9.3%	99.0%
Missing revenue data	2	1	3	1.0%	100.0%
Total	219	71	290	100.0%	
*Some entities found in the databases either did not contain revenue data or were determined to be small based on employee count thresholds.					

The plurality of petitions in the sample were submitted by businesses in California, with 76 (or 14.8 percent of 514), followed by New York, Texas, Florida, and New Jersey. Together, these top five states accounted for 259 petitions—more than half of the sample.

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[14] Numbers reported in Hoover's were point figures; those reported in Cortera and Manta were range estimates.

Table 10: Form I-140 Geographic Distribution of Petitions in Sample, Top 10 States			
Rank	**State**	**Number of Petitions**	**Proportion of Sample**
1	CA	76	14.8%
2	NY	57	11.1%
3	TX	49	9.5%
4	FL	40	7.8%
5	NJ	37	7.2%
6	IL	32	6.2%
7	VA	30	5.8%
8	PA	20	3.9%
9	NC	18	3.5%
10	OH	13	2.5%

Discussion of Impacts

USCIS is proposing a $700 fee for the Form I-140, a 21 percent increase. Current fees for this form are $580, meaning the proposed increase would add $120 in fees per petition. In order to calculate the impact of this increase, USCIS estimated that the total costs associated with the proposed fee increase for each entity, divided by sales revenue of that entity.[15,16] Since entities can file multiple petitions, the analysis considers the number of petitions submitted by each entity. Entities that were considered small based on employee count with missing revenue data were excluded. Among the 287 small entities with reported revenue data, all experienced an economic impact considerably less than 1 percent. The greatest economic impact imposed by this fee change totaled 0.68 percent and the smallest totaled 0.000002 percent. The average impact on all 287 small entities with revenue data was 0.04 percent. The evidence suggests that the additional proposed fee imposed by this rule does not represent a significant economic impact on these entities.

Issues with Data

Again with Form I-140, we attempted to be as inclusive as possible of all petitioners. However, the database contained some submitted petitions where the EIN number was left blank or "0." Instructions for Form I-140 state that except for aliens of extraordinary ability or those petitioning under national interest waivers, all other Form I-140 petitions must require proof of a permanent job offer. Therefore, an EIN number must be coded on the form or it will be rejected (except in the two cases above). The blanks in our database could trace to these beneficiaries or not, many of those petitions submitted with a blank or "0" EIN also did not provide an entity

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[15] Total Impact to Entity = (Number of Petitions X $120)/Entity Sales Revenue.

[16] USCIS used the lower end of the sales revenue range for those entities where ranges were provided.

name. Manual data-cleaning was again impractical in a situation where thousands of records must be sorted.

The sample constructed was larger than necessary, weeding out any duplicates *within that sample*. There were no duplicates detected within the sample, indicating that irregularities in the data received were not large enough as to skew our understanding of the underlying parameters of the petitioner population.

Cumulative Impact of Form I-129 and Form I-140

In addition to the individual Form I-129 and Form I-140 analyses, USCIS analyzed any cumulative impacts of these form types to determine if there were any impacts when analyzed together. USCIS isolated those entities that overlapped in both samples of Forms I-129 and I-140 by EIN. Only 3 entities had EINs that overlapped in both samples. Of these 3 entities, 2 of them were small entities and 1 was not a small entity. Only 1 entity submitted multiple Form I-129 petitions, while all 3 entities submitted multiple Form I-140 petitions. Due to little overlap in entities in the samples and the relatively minor impacts on revenue of fee increases of Forms I-129 and I-140, USCIS does not expect the combined impact of these two forms to be an economically significant burden on a substantial number of small entities.

Table 11: Entities in Both Form I-129 and Form I-140 Samples			
Entity	Number of Form I-129 Petitions	Number of Form I-140 Petitions	Small Entity Status
Sample Entity 1	1	3	Not Small
Sample Entity 2	24	55	Small
Sample Entity 3	1	17	Small

Civil Surgeon Designations, Form I-910 Data

Research Population and Sampling Statistics

The USCIS National Benefits Center reports that there were 719 Form I-910 applications received in the National Processing Workflow Repository between August 2014 and July 2015. These applications contain many duplicates as an individual can apply for multiple clinic practices and a practice can have multiple individual applicants. There were 602 distinct entities identified and 548 individuals associated with these requests.

Data from the 12-month period submissions of I-910 petitions were pooled to create a population of 719 foreign worker petitions. These represented a population of 602 unique entities petitioning for workers. As with the employee petitions described for Form I-129 and Form I-140, we selected a random sample of 329 entities and successfully matched 247 of those

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entities, which exceeds the sample-accuracy threshold.[17] Five entities in the sample were found in the databases, but did not provide applicable revenue or employee count data. Two entities were local departments of health. The remaining 77 entities were not found in any of the databases. From the revenue and employment information on these entities, we determined that 322, or 97.9 percent, of the petitioners met the definition of small entities, that over half of these small entities had annual revenues of less than $1 million, and that approximately 9 percent of them had petitioned for three or more workers over that year.

Table 12: Outline of Form I-910 Statistics (August 2014 – July 2015)			
Parameter	**Quantity**	**Proportion of Population**	**Comments**
Population—applications	719	-	Total number of applications.
Population—unique entities	602	100.0%	Unique entities submitting applications.
Minimum Required Sample	235	-	Sample size necessary to achieve confidence goals.
Selected Sample	329	100.0%	Sample selected to match 235 entities.
Non-matched Entities (S)	<u>77</u>	23.4%	Entities without data in Hoover's, Manta.com, or Cortera.com.
Matched Entities	252	76.6%	Entities matched in all databases.*
Sub-Sample Missing Data (S)	<u>5</u>	1.5%	Entities among the 252 matches lacking revenue or employee count data.
Matched Small Entities (S)	<u>240</u>	72.9%	Matched entities among 252, small entities based on revenue or employee data.
Matched Non-small Entities	7	2.1%	Number of non-small entities out of the 252 matches.*
Number of small entities discovered in research	**322**	**97.9%**	<u>77</u> + <u>5</u> + <u>240</u> = **322**
*Includes two local government jurisdictions.			

The population of civil-surgeon request applicants is different from the foreign-worker employment petitioners in that they are concentrated in medical fields. Within the sample, 72 percent of entities had submitted just one petition in the 12-month timeframe; over 89 percent entities submitted only one or two petitions. At the other end of the scale, only about 3 percent of entities submitted more than 4 petitions.

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[17] To accurately characterize a population of 602 entities, a sample of 235 is required to project findings on the population with a 95 percent confidence level and a 5 percent confidence interval.

Table 13: Total Form I-910 Petitions per Entity				
Petitions per Entity	Entity Count	Cumulative Entities	Percentage of Sample	Cumulative Percentage
1	237	237	72.0%	72.0%
2	57	294	17.3%	89.4%
3	15	309	4.6%	93.9%
4	11	320	3.3%	97.3%
5	5	325	1.5%	98.8%
6	1	326	0.3%	99.1%
7	1	327	0.3%	99.4%
8	1	328	0.3%	99.7%
9	1	329	0.3%	100.0%
Total	329		100.0%	

When small and non-small entities are treated separately, the distributions are very different. Surprisingly, those entities identified or assumed to be small were much more likely to submit multiple petitions per entity, whereas those entities identified as non-small only submitted two or fewer petitions per entity.

Table 14: Form I-910 Petitions per Entity, Non-small and Small						
	Non-small Entities			Small Entities		
Petitions per Entity	Entities	Percentage of Total	Cumulative Percentage	Entities	Percentage of Total	Cumulative Percentage
1	6	85.7%	85.7%	231	71.7%	71.7%
2	1	14.3%	100.0%	56	17.4%	89.1%
3	0	-	-	15	4.7%	93.8%
4	0	-	-	11	3.4%	97.2%
5	0	-	-	5	1.6%	98.8%
6	0	-	-	1	0.3%	99.1%
7	0	-	-	1	0.3%	99.4%
8	0	-	-	1	0.3%	99.7%
9	0	-	-	1	0.3%	100.0%
Total	7	100.0%		322	100.0%	

Among small entities in the population, revenues were generally lower than in the Form I-129 and Form I-140 samples; nearly 78 percent of applicants reported less than a million dollars in revenue. Only three entities (about 2 percent) made over $10 million in revenue.

Table 15: Form I-910 Revenue Distribution of Matched Small Entities

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Revenue Range of Matched Small Entities	Identified in Hoover's	Identified via Manta, Cortera, or Guidestar	Total	Percentage	Cumulative Percentage
< $100K	8	0	8	3.3%	3.3%
$100K to < $500K	128	4	132	55.0%	58.3%
$500K to < $1M	34	13	47	19.6%	77.9%
$1M to < $5M	29	16	45	18.8%	96.7%
$5M to < $10M	3	0	3	1.3%	97.9%
$10M to < $50M	1	0	1	0.4%	98.3%
$50M to < $100M	1	0	1	0.4%	98.8%
>= $100M	1	0	1	0.4%	99.2%
Missing revenue data	1	1	2	0.8%	100.0%
Total	**206**	**34**	**240**	**100.0%**	

The plurality of petitions in the sample were submitted by businesses in California, with 54 (or 16.4 percent of 329 entities), followed by New York, Florida, Texas, and New Jersey. As with the I-129 and I-140 petitions, these top five states accounted for 200 petitions, which is more than half of the sample.

Table 16: Form I-910 Geographic Distribution of Petitions in Sample, Top 10 States			
Rank	State	Number of Petitions	Proportion of Sample
1	CA	54	16.4%
2	NY	52	15.8%
3	FL	41	12.5%
4	TX	28	8.5%
5	NJ	25	7.6%
6	GA	13	4.0%
7	IL	12	3.6%
8	AZ	10	3.0%
9	MA	9	2.7%
10	NC	8	2.4%

Discussion of Impacts

USCIS is proposing a fee of $785 for Form I-910, a 28 percent increase. Current fees for this form are $615, meaning the proposed increase would add $170 in fees per petition. In order to calculate the impact of this increase, USCIS estimated that the total costs associated with the

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proposed fee increase for each entity, divided by sales revenue of that entity.[18, 19] Since entities can file multiple petitions, the analysis considers the number of petitions submitted by each entity. Entities that were considered small based on employee count with missing revenue data were excluded. Among the 238 small entities with reported revenue data, all experienced an economic impact considerably less than 1 percent. The greatest economic impact imposed by this fee change totaled 0.61 percent and the smallest totaled 0.00002 percent. The average impact on all 238 small entities with revenue data was 0.09 percent. The evidence suggests that the additional proposed fee imposed by this rule does not represent a significant economic impact on these entities.

Regional Center Designation Under the Immigrant Investor Program, Form I-924

Congress created the Immigrant Investor Program, or employment-based fifth preference (EB-5), in 1990 under section 203(b)(5) of the Immigration and Nationality Act to stimulate the economy through job creation and capital investment by foreign national investors. Foreign investors have the opportunity to obtain lawful permanent residence in the United States for themselves, their spouses, and their minor unmarried children through a certain level of capital investment and associated job creation or preservation. There are two distinct EB-5 pathways for a foreign investor to gain lawful permanent resident: the Basic Program and the Regional Center Program. Both options require that the foreign investor make a capital investment in a new commercial enterprise located within the United States. The capital investment amount is generally set at $1,000,000, but may be reduced to $500,000 if the investment is made in a "Targeted Employment Area."

A regional center pools funds into development loans or equity for commercial space and real estate development projects. As of January 4, 2016, there were 790 USCIS-approved Regional Centers.[20] Entities seeking designation as regional centers file Form I-924 along with supporting materials. Approved regional centers are currently required to file the Supplement to Form I-924, Form I-924A, annually to demonstrate continued eligibility for regional center designation. Currently, there are no filing fees associated with this supplement. DHS is proposing to change the name of the Form I-924A annual filing to 'Annual Certification of Regional Center', Form I-924A.

DHS proposes to increase the fee from $6,230 to $17,795 for entities requesting approval and designation as a Regional Center under the Immigrant Investor Program, Form I-924. In addition, DHS proposes to require a new fee for the annual filings of Supplement Form I-924A; that proposed fee would be $3,035 per filing.[21] The application process will require the same

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[18] Total Impact to Entity = (Number of Petitions X $170)/Entity Sales Revenue.

[19] USCIS used the lower end of the sales revenue range for those entities where ranges were provided.

[20] USCIS Immigrant Investor Regional Centers: http://www.uscis.gov/working-united-states/permanent-workers/employment-based-immigration-fifth-preference-eb-5/immigrant-investor-regional-centers.

[21] The Supplement to Form I-924A is used to certify a Regional Center's continued eligibility for the Regional Center designation through an annual certification. Each designated Regional Center entity must file a Form I-924A for each fiscal year within 90 day after the end of the fiscal year of the calendar year in which the fiscal year ended. See http://www.uscis.gov/i-924a.

information from applicants that is currently required. Using a 13-month parameter from August 1, 2014 to August 31, 2015, USCIS received a total of 412 Form I-924 and I-924A applications. These applications include the request for newly designated regional center, as well as requests for continued designation for existing regional centers.

Discussion of Impacts

DHS proposes to increase the fee for the Application for Regional Center Designation Under the Immigrant Investor Program, Form I–924, from \$6,230 to \$17,795, an \$11,565 (186 percent) increase. Additionally, DHS proposes to introduce a filing fee of \$3,035 for the Form I-924A. In establishing this fee, DHS is also clarifying the related regulations which provide for the annual regional center review related to Form I-924A. Currently, there is no procedure for regional centers seeking to withdraw their designation and discontinue their participation in the program. Formal termination is currently processed by USCIS issuing a Notice of Intent to Terminate and termination notice. The proposed withdrawal procedure would allow a regional center to proactively request withdrawal without the need for the more formal notices sent out by USCIS.

DHS was not able to determine the numbers of regional centers that would be considered small entities. Regional centers are difficult to assess because there is a lack of official data on employment, income, and industry classification for these entities. Regional centers also pose a challenge for analysis as the structure is often complex and can involve many related business and financial activities not directly involved with EB-5 activities. Regional centers can be made up of several layers of business and financial activities that focus on matching foreign investor funds to development projects to capture above market return differentials. While USCIS attempted to treat the regional centers similar to the other entities in this analysis, we were not able to identify most of the entities in any of the public or private databases. Furthermore, while regional centers are an integral component of the EB-5 program, DHS does not collect data on the administrative fees the regional centers charge to the foreign investors who are investing in one of their projects. DHS did not focus on the bundled capital investment amounts (either \$1 million or \$500 thousand per investor) that the regional center invests into a new commercial enterprise. Such investments amounts are not necessarily indicative of whether the regional center is appropriately characterized as a small entity for purposes of the RFA.

Due to the lack of regional center revenue data, DHS assumes regional centers collect revenue through the administrative fees charged to investors. Searching through several public websites, DHS gathers that administrative fees charged to investors could range between \$30,000 and \$100,000 per investor.[22] DHS does not know the extent to which these regional centers can pass along the fee increases to the individual investors. Passing along the costs from this rule

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[22] Yen, Christine et al., "A Report on Source of Funds: Perils of the Administrative Fee." *EB5 Investors Magazine* (August 20, 2015), available at: http://www.eb5investors.com/magazine/article/A-Report-on-Source-of-Funds. See also Green, Merritt. "The Costs of an EB-5 Regional Center Project Investment." (June 27, 2014), available at: http://www.generalcounsellaw.com/the-cost-of-an-eb-5-regional-center-project-investment/.

could reduce or eliminate the economic impacts to the regional centers. While DHS cannot definitively claim there is no significant economic impact to these small entities based on existing information, DHS would assume existing regional centers that have revenues equal to or less than $303,500 per year[23] (some of which we assume would be derived from administrative fees charged to individual investors) could experience a significant economic impact if we assume a fee increase that represents 1 percent of annual revenue is a "significant" economic burden under the RFA. DHS also assumes newly designated regional centers that have revenues equal to or less than $1,779,500 per year[24] could also experience a significant impact. DHS was able to obtain some sample data on 440 regional centers operating 5,886 projects. These 5,886 projects had a total of 54,506 investors, averaging 124 investors per regional center.[25] Assuming an average of 124 investors is a representative proxy of the regional centers, and that $30,000 is the minimum administrative fee charged by regional centers, then such fees would represent approximately $3,720,000 in revenue. In that case, the proposed filing fee increase for Form I-924 and the creation of a new fee for Form I-924A would not cause a significant economic impact to these entities. DHS requests information from the public on data sources on the average revenues collected by regional centers in the form of administrative fees and the extent to which regional centers may pass along the fee increases to the individual investors.

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[23] Calculation: 1 percent of $303,500 = $3,035 (the new proposed fee for Form I-924A).
[24] Calculation: 1 percent of $1,779,500 = $17,995 (the new proposed fee for Form I-924).
[25] Department of Homeland Security, USCIS, Immigrant Investor Program Office.

Appendix A: SBA NAICS Size Standards for I-129, I-140, and I-910 Petitions in Sample Dataset

NAICS Codes	NAICS Industry Description	Size standards in millions of dollars ($)	Size standards in number of employees
111140	Wheat Farming	0.75	
111331	Apple Orchards	0.75	
111920	Cotton Farming	0.75	
111998	All Other Miscellaneous Crop Farming	0.75	
115112	Soil Preparation, Planting, and Cultivating	7.5	
211111	Crude Petroleum and Natural Gas Extraction		1250
212321	Construction Sand and Gravel Mining		500
213111	Drilling Oil and Gas Wells		100
213112	Support Activities for Oil and Gas Operations	38.5	
213114	Support Activities for Metal Mining	20.5	
236115	New Single-family Housing Construction (Except For-Sale Builders)	36.5	
236118	Residential Remodelers	36.5	
236210	Industrial Building Construction	36.5	
236220	Commercial and Institutional Building Construction	36.5	
237210	Land Subdivision	27.5	
237310	Highway, Street, and Bridge Construction	36.5	
237990	Other Heavy and Civil Engineering Construction	36.5	
238130	Framing Contractors	15	
238210	Electrical Contractors and Other Wiring Installation Contractors	15	
238220	Plumbing, Heating, and Air-Conditioning Contractors	15	
238310	Drywall and Insulation Contractors	15	
238990	All Other Specialty Trade Contractors	15	
311411	Frozen Fruit, Juice and Vegetable Manufacturing		1000
311811	Retail Bakeries		500
311919	Other Snack Food Manufacturing		1250
311920	Coffee and Tea Manufacturing		750
311999	All Other Miscellaneous Food Manufacturing		500
312140	Distilleries		1000
313210	Broadwoven Fabric Mills		1000
316210	Footwear Manufacturing		1000
321911	Wood Window and Door Manufacturing		1000
321912	Cut Stock, Resawing Lumber, and Planing		500
322291	Sanitary Paper Product Manufacturing		1500

NAICS Codes	NAICS Industry Description	Size standards in millions of dollars ($)	Size standards in number of employees
324110	Petroleum Refineries[26]		1500
325180	Other Basic Inorganic Chemical Manufacturing		1000
325199	All Other Basic Organic Chemical Manufacturing		1250
325211	Plastics Material and Resin Manufacturing		1250
325220	Artificial and Synthetic Fibers and Filaments Manufacturing		1000
325320	Pesticide and Other Agricultural Chemical Manufacturing		1000
325412	Pharmaceutical Preparation Manufacturing		1250
325414	Biological Product (except Diagnostic) Manufacturing		1250
325611	Soap and Other Detergent Manufacturing		1000
325991	Custom Compounding of Purchased Resins		500
325998	All Other Miscellaneous Chemical Product and Preparation Manufacturing		500
326113	Unlaminated Plastics Film and Sheet (except Packaging) Manufacturing		750
326199	All Other Plastics Product Manufacturing		750
326211	Tire Manufacturing (except Retreading)[27]		1500
326299	All Other Rubber Product Manufacturing		500
327991	Cut Stone and Stone Product Manufacturing		500
331110	Iron and Steel Mills and Ferroalloy Manufacturing		1500
331318	Other Aluminum Rolling, Drawing, and Extruding		750
331523	Nonferrous Metal Die-Casting Foundries		500
332119	Metal Crown, Closure, and Other Metal Stamping (except Automotive)		500

[26] NAICS code 324110 – To qualify as small for purposes of Government procurement, the petroleum refiner, including its affiliates, must be a concern that has either no more than 1,500 employees or no more than 200,000 barrels per calendar day total Operable Atmospheric Crude Oil Distillation capacity. Capacity includes all domestic and foreign affiliates, all owned or leased facilities, and all facilities under a processing agreement or an arrangement such as an exchange agreement or a throughput. To qualify under the capacity size standard, the firm, together with its affiliates, must be primarily engaged in refining crude petroleum into refined petroleum products. A firm's "primary industry" is determined in accordance with 13 CFR § 121.107.

[27] NAICS code 326211 –For Government procurement, a firm is small for bidding on a contract for pneumatic tires within Census NAICS Product Classification codes 3262111 and 3262113, provided that: the value of tires within Census NAICS Product Classification codes 3262113 that it manufactured in the United States during the previous calendar year is more than 50 percent of the value of its total worldwide manufacture, the value of pneumatic tires within Census Classification codes 30111 and 30112 comprising its total worldwide manufacture during the preceding calendar year was less than 5 percent of the value of all such tires manufactured in the United States during that period, and the value of the principal product that it manufactured, produced, or sold worldwide during the preceding calendar year is less than 10 percent of the total value of such products manufactured or otherwise produced or sold in the United States during that period.

NAICS Codes	NAICS Industry Description	Size standards in millions of dollars ($)	Size standards in number of employees
332215	Metal Kitchen Cookware, Utensil, Cutlery, and Flatware (except Precious) Manufacturing		750
332312	Fabricated Structural Metal Manufacturing		500
332322	Sheet Metal Work Manufacturing		500
332323	Ornamental and Architectural Metal Work Manufacturing		500
332510	Hardware Manufacturing		750
332618	Other Fabricated Wire Product Manufacturing		500
332710	Machine Shops		500
332721	Precision Turned Product Manufacturing		500
333132[28]	Oil and Gas Field Machinery and Equipment Manufacturing		1250
333242	Semiconductor Machinery Manufacturing		150
333249	Other Industrial Machinery Manufacturing		500
333314	Optical Instrument and Lens Manufacturing		500
333318	Other Commercial and Service Industry Machinery Manufacturing		1000
333413	Industrial and Commercial Fan and Blower and Air Purification Equipment Manufacturing		500
333414	Heating Equipment (except Warm Air Furnaces) Manufacturing		500
333415	Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment Manufacturing		1250
333515	Cutting Tool and Machine Tool Accessory Manufacturing		500
333519	Rolling Mill and Other Metalworking Machinery Manufacturing		500
333613	Mechanical Power Transmission Equipment Manufacturing		750
333618	Other Engine Equipment Manufacturing		1500
333993	Packaging Machinery Manufacturing		500
333999	All Other Miscellaneous General Purpose Machinery Manufacturing		500

[28] NAICS Subsectors 333, 334, 335 and 336 – For rebuilding machinery or equipment on a factory basis, or equivalent, use the NAICS code for a newly manufactured product. Concerns performing major rebuilding or overhaul activities do not necessarily have to meet the criteria for being a "manufacturer" although the activities may be classified under a manufacturing NAICS code. Ordinary repair services or preservation are not considered rebuilding.

NAICS Codes	NAICS Industry Description	Size standards in millions of dollars ($)	Size standards in number of employees
334111[29]	Electronic Computer Manufacturing		1250
334112	Computer Storage Device Manufacturing		1250
334118	Computer Terminal and Other Computer Peripheral Equipment Manufacturing		1000
334413	Semiconductor and Related Device Manufacturing		1250
334418	Printed Circuit Assembly (Electronic Assembly) Manufacturing		750
334419	Other Electronic Component Manufacturing		750
334511	Search, Detection, Navigation, Guidance, Aeronautical, and Nautical System and Instrument Manufacturing		1250
334515	Instrument Manufacturing for Measuring and Testing Electricity and Electrical Signals		750
334516	Analytical Laboratory Instrument Manufacturing		1000
334519	Other Measuring and Controlling Device Manufacturing		500
335311[30]	Power, Distribution and Specialty Transformer Manufacturing		750
335312	Motor and Generator Manufacturing		1250
335911	Storage Battery Manufacturing		1250
335932	Noncurrent-Carrying Wiring Device Manufacturing		1000
335999	All Other Miscellaneous Electrical Equipment and Component Manufacturing		500
336310[31]	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing		1000
336360	Motor Vehicle Seating and Interior Trim Manufacturing		1500
336390	Other Motor Vehicle Parts Manufacturing		1000
337214	Office Furniture (Except Wood) Manufacturing		1000
337215	Showcase, Partition, Shelving, and Locker Manufacturing		500
339112	Surgical and Medical Instrument Manufacturing		1000
339113	Surgical Appliance and Supplies Manufacturing		750
339116	Dental Laboratories		500
339993	Fastener, Button, Needle and Pin Manufacturing		750
339999	All Other Miscellaneous Manufacturing		500
423110	Automobile and Other Motor Vehicle Merchant Wholesalers		250
423120	Motor Vehicle Supplies and New Parts Merchant		200

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[29] Id.

[30] Id.

[31] Id.

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NAICS Codes	NAICS Industry Description	Size standards in millions of dollars ($)	Size standards in number of employees
	Wholesalers		
423420	Office Equipment Merchant Wholesalers		200
423430	Computer and Computer Peripheral Equipment and Software Merchant Wholesalers		250
423440	Other Commercial Equipment Merchant Wholesalers		100
423450	Medical, Dental, and Hospital Equipment and Supplies Merchant Wholesalers		200
423510	Metal Service Centers and Other Metal Merchant Wholesalers		200
423520	Coal and Other Mineral and Ore Merchant Wholesalers		100
423620	Household Appliances, Electric Housewares, and Consumer Electronics Merchant Wholesalers		200
423720	Plumbing and Heating Equipment and Supplies (Hydronics) Merchant Wholesalers		200
423830	Industrial Machinery and Equipment Merchant Wholesalers		100
423840	Industrial Supplies Merchant Wholesalers		100
423860	Transportation Equipment and Supplies (except Motor Vehicle) Merchant Wholesalers		150
423920	Toy and Hobby Goods and Supplies Merchant Wholesalers		150
423990	Other Miscellaneous Durable Goods Merchant Wholesalers		100
424210	Drugs and Druggists' Sundries Merchant Wholesalers		250
424310	Piece Goods, Notions, and Other Dry Goods Merchant Wholesalers		100
424330	Women's, Children's, and Infants' Clothing and Accessories Merchant Wholesalers		100
424410	General Line Grocery Merchant Wholesalers		250
424420	Packaged Frozen Food Merchant Wholesalers		200
424460	Fish and Seafood Merchant Wholesalers		100
424470	Meat and Meat Product Merchant Wholesalers		150
424490	Other Grocery and Related Products Merchant Wholesalers		250
424610	Plastics Materials and Basic Forms and Shapes Merchant Wholesalers		150
424710	Petroleum Bulk Stations and Terminals		200
424720	Petroleum and Petroleum Products Merchant Wholesalers (except Bulk Stations and Terminals)		200
424910	Farm Supplies Merchant Wholesalers		200

NAICS Codes	NAICS Industry Description	Size standards in millions of dollars ($)	Size standards in number of employees
424930	Flower, Nursery Stock, and Florists' Supplies Merchant Wholesalers		100
424990	Other Miscellaneous Nondurable Goods Merchant Wholesalers		100
442110	Furniture Stores	20.5	
442299	All Other Home Furnishings Stores	20.5	
443142	Electronics Stores	32.5	
444110	Home Centers	38.5	
444220	Nursery and Garden Centers	11	
445110	Supermarkets and Other Grocery (except Convenience) Stores	32.5	
445120	Convenience Stores	29.5	
445210	Meat Markets	7.5	
445299	All Other Specialty Food Stores	7.5	
445310	Beer, Wine and Liquor Stores	7.5	
446110	Pharmacies and Drug Stores	27.5	
446120	Cosmetics, Beauty Supplies and Perfume Stores	27.5	
446130	Optical Goods Stores	20.5	
448110	Men's Clothing Stores	11	
448120	Women's Clothing Stores	27.5	
448140	Family Clothing Stores	38.5	
448310	Jewelry Stores	15	
451211	Book Stores	27.5	
453210	Office Supplies and Stationery Stores	32.5	
453220	Gift, Novelty and Souvenir Stores	7.5	
453920	Art Dealers	7.5	
453998	All Other Miscellaneous Store Retailers (except Tobacco Stores)	7.5	
454113	Mail-Order Houses	38.5	
454390	Other Direct Selling Establishments	7.5	
481111	Scheduled Passenger Air Transportation		1500
484122	General Freight Trucking, Long-Distance, Less Than Truckload	27.5	
484210	Used Household and Office Goods Moving	27.5	
488320	Marine Cargo Handling	38.5	

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NAICS Codes	NAICS Industry Description	Size standards in millions of dollars ($)	Size standards in number of employees
488510	Freight Transportation Arrangement[32]	15	
493110	General Warehousing and Storage	27.5	
511110	Newspaper Publishers		1000
511130	Book Publishers		1000
511210	Software Publishers	38.5	
512110	Motion Picture and Video Production	32.5	
512199	Other Motion Picture and Video Industries	20.5	
515111	Radio Networks	32.5	
515120	Television Broadcasting	38.5	
517110	Wired Telecommunications Carriers		1500
517210	Wireless Telecommunications Carriers (except Satellite)		1500
517911	Telecommunications Resellers		1500
517919	All Other Telecommunications	32.5	
518210	Data Processing, Hosting, and Related Services	32.5	
519110	News Syndicates	27.5	
519190	All Other Information Services	27.5	
522110	Commercial Banking[33]	$550 million in assets	
522130	Credit Unions[34]	$550 million in assets	
522292	Real Estate Credit	38.5	
522298	All Other Nondepository Credit Intermediation	38.5	
522310	Mortgage and Nonmortgage Loan Brokers	7.5	
522320	Financial Transactions Processing, Reserve, and Clearinghouse Activities	38.5	
523120	Securities Brokerage	38.5	
523130	Commodity Contracts Dealing	38.5	
523910	Miscellaneous Intermediation	38.5	
523920	Portfolio Management	38.5	
523930	Investment Advice	38.5	

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[32] NAICS codes 488510, 531210, 541810, 561510, 561520 and 561920 – As measured by total revenues, but excluding funds received in trust for an unaffiliated third party, such as bookings or sales subject to commissions. The commissions received are included as revenue.

[33] NAICS Codes 522110, 522120, 522130, 522190, and 522210 – A financial institution's assets are determined by averaging the assets reported on its four quarterly financial statements for the preceding year. "Assets" means the assets defined according to the Federal Financial Institutions Examination Council 041 call report form for NAICS Codes 522110, 522120, 522190, and 522210 and the National Credit Union Administration 5300 call report form for NAICS code 522130.

[34] Id.

NAICS Codes	NAICS Industry Description	Size standards in millions of dollars ($)	Size standards in number of employees
523991	Trust, Fiduciary and Custody Activities	38.5	
524114	Direct Health and Medical Insurance Carriers	38.5	
524126	Direct Property and Casualty Insurance Carriers		1500
524127	Direct Title Insurance Carriers	38.5	
524128	Other Direct Insurance (except Life, Health and Medical) Carriers	38.5	
524210	Insurance Agencies and Brokerages	7.5	
524298	All Other Insurance Related Activities	15	
525110	Pension Funds	32.5	
525120	Health and Welfare Funds	32.5	
525910	Open-End Investment Funds	32.5	
525920	Trusts, Estates, and Agency Accounts	32.5	
531110	Lessors of Residential Buildings and Dwellings[35]	27.5	
531210	Offices of Real Estate Agents and Brokers[36]	7.5	
532490	Other Commercial and Industrial Machinery and Equipment Rental and Leasing	32.5	
541110	Offices of Lawyers	11	
541211	Offices of Certified Public Accountants	20.5	
541219	Other Accounting Services	20.5	
541310	Architectural Services	7.5	
541320	Landscape Architectural Services	7.5	
541330	Engineering Services	15	
541370	Surveying and Mapping (except Geophysical) Services	15	
541410	Interior Design Services	7.5	
541430	Graphic Design Services	7.5	
541511	Custom Computer Programming Services	27.5	
541512	Computer Systems Design Services	27.5	
541513	Computer Facilities Management Services	27.5	
541519	Other Computer Related Services	27.5	
541611	Administrative Management and General Management Consulting Services	15	
541612	Human Resources Consulting Services	15	

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[35] NAICS codes 531110, 531120, 531130, and 531190 – Leasing of building space to the Federal Government by Owners: For Government procurement, a size standard of $38.5 million in gross receipts applies to the owners of building space leased to the Federal Government. The standard does not apply to an agent.

[36] NAICS codes 488510, 531210, 541810, 561510, 561520 and 561920 – As measured by total revenues, but excluding funds received in trust for an unaffiliated third party, such as bookings or sales subject to commissions. The commissions received are included as revenue.

NAICS Codes	NAICS Industry Description	Size standards in millions of dollars ($)	Size standards in number of employees
541613	Marketing Consulting Services	15	
541614	Process, Physical Distribution and Logistics Consulting Services	15	
541618	Other Management Consulting Services	15	
541620	Environmental Consulting Services	15	
541690	Other Scientific and Technical Consulting Services	15	
541711	Research and Development in Biotechnology[37]		1000
541712	Research and Development in the Physical, Engineering, and Life Sciences (except Biotechnology) [38]		1000
541720	Research and Development in the Social Sciences and Humanities	20.5	
541810	Advertising Agencies[39]	15	
541820	Public Relations Agencies	15	
541830	Media Buying Agencies	15	
541910	Marketing Research and Public Opinion Polling	15	
541930	Translation and Interpretation Services	7.5	
541990	All Other Professional, Scientific and Technical Services	15	
551112	Offices of Other Holding Companies	20.5	
561110	Office Administrative Services	7.5	
561210	Facilities Support Services[40]	38.5	

[37] NAICS code 541711 and 541712 – For research and development contracts requiring the delivery of a manufactured product, the appropriate size standard is that of the manufacturing industry. "Research and Development" means laboratory or other physical research and development. It does not include economic, educational, engineering, operations, systems, or other nonphysical research; or computer programming, data processing, commercial and/or medical laboratory testing. For purposes of the Small Business Innovation Research (SBIR) program only, a different definition has been established by law. See section 121.701 of these regulations. "Research and Development" for guided missiles and space vehicles includes evaluations and simulation, and other services requiring thorough knowledge of complete missiles and spacecraft.

[38] Id.

[39] NAICS codes 488510, 531210, 541810, 561510, 561520 and 561920 – As measured by total revenues, but excluding funds received in trust for an unaffiliated third party, such as bookings or sales subject to commissions. The commissions received are included as revenue.

[40] NAICS 561210 – Facilities Support Services: If one or more activities of Facilities Support Services as defined in paragraph (b) (below in this footnote) can be identified with a specific industry and that industry accounts for 50 percent or more of the value of an entire procurement, then the proper classification of the procurement is that of the specific industry, not Facilities Support Services. "Facilities Support Services" requires the performance of three or more separate activities in the areas of services or specialty trade contractors industries. If services are performed, these service activities must each be in a separate NAICS industry. If the procurement requires the use of specialty trade contractors (plumbing, painting, plastering, carpentry, etc.), all such specialty trade contractors activities are considered a single activity and classified as "Building and Property Specialty Trade Services." Since "Building and Property Specialty Trade Services" is only one activity, two additional activities of separate NAICS industries are required for a procurement to be classified as "Facilities Support Services."

NAICS Codes	NAICS Industry Description	Size standards in millions of dollars ($)	Size standards in number of employees
561311	Employment Placement Agencies	27.5	
561320	Temporary Help Services	27.5	
561422	Telemarketing Bureaus and Other contact Centers	15	
561499	All Other Business Support Services	15	
561510	Travel Agencies[41]	20.5	
561599	All Other Travel Arrangement and Reservation Services	20.5	
561612	Security Guards and Patrol Services	20.5	
561720	Janitorial Services	18	
561730	Landscaping Services	7.5	
561910	Packaging and Labeling Services	11	
561920	Convention and Trade Show Organizers[42]	11	
561990	All Other Support Services	11	
562920	Materials Recovery Facilities	20.5	
562998	All Other Miscellaneous Waste Management Services	7.5	
611110	Elementary and Secondary Schools	11	
611210	Junior Colleges	20.5	
611310	Colleges, Universities and Professional Schools	27.5	
611410	Business and Secretarial Schools	7.5	
611420	Computer Training	11	
611511	Cosmetology and Barber Schools	7.5	
611512	Flight Training	27.5	
611620	Sports and Recreation Instruction	7.5	
611630	Language Schools	11	
611699	All Other Miscellaneous Schools and Instruction	11	
611710	Educational Support Services	15	
621111	Offices of Physicians (except Mental Health Specialists)	11	
621112	Offices of Physicians, Mental Health Specialists	11	
621210	Offices of Dentists	7.5	
621320	Offices of Optometrists	7.5	
621330	Offices of Mental Health Practitioners (except Physicians)	7.5	

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[41]NAICS codes 488510, 531210, 541810, 561510, 561520 and 561920 – As measured by total revenues, but excluding funds received in trust for an unaffiliated third party, such as bookings or sales subject to commissions. The commissions received are included as revenue.

[42] NAICS codes 488510, 531210, 541810, 561510, 561520 and 561920 – As measured by total revenues, but excluding funds received in trust for an unaffiliated third party, such as bookings or sales subject to commissions. The commissions received are included as revenue.

NAICS Codes	NAICS Industry Description	Size standards in millions of dollars ($)	Size standards in number of employees
621340	Offices of Physical, Occupational and Speech Therapists and Audiologists	7.5	
621391	Offices of Podiatrists	7.5	
621399	Offices of All Other Miscellaneous Health Practitioners	7.5	
621410	Family Planning Centers	11	
621491	HMO Medical Centers	32.5	
621493	Freestanding Ambulatory Surgical and Emergency Centers	15	
621498	All Other Outpatient Care Centers	20.5	
621511	Medical Laboratories	32.5	
621610	Home Health Care Services	15	
621991	Blood and Organ Banks	32.5	
621999	All Other Miscellaneous Ambulatory Health Care Services	15	
622110	General Medical and Surgical Hospitals	38.5	
622210	Psychiatric and Substance Abuse Hospitals	38.5	
622310	Specialty (except Psychiatric and Substance Abuse) Hospitals	38.5	
623110	Nursing Care Facilities (Skilled Nursing Facilities)	27.5	
623220	Residential Mental Health and Substance Abuse Facilities	15	
623311	Continuing Care Retirement Communities	27.5	
624190	Other Individual and Family Services	11	
624410	Child Day Care Services	7.5	
711110	Theater Companies and Dinner Theaters	20.5	
711120	Dance Companies	11	
711130	Musical Groups and Artists	11	
711190	Other Performing Arts Companies	27.5	
711211	Sports Teams and Clubs	38.5	
711219	Other Spectator Sports	11	
711410	Agents and Managers for Artists, Athletes, Entertainers and Other Public Figures	11	
711510	Independent Artists, Writers, and Performers	7.5	
712110	Museums	27.5	
713120	Amusement Arcades	7.5	
713990	All Other Amusement and Recreation Industries	7.5	
721110	Hotels (except Casino Hotels) and Motels	32.5	
721191	Bed-and-Breakfast Inns	7.5	
722310	Food Service Contractors	38.5	

NAICS Codes	NAICS Industry Description	Size standards in millions of dollars ($)	Size standards in number of employees
722511	Full-Service Restaurants	7.5	
722515	Snack and Nonalcoholic Beverage Bars	7.5	
811211	Consumer Electronics Repair and Maintenance	7.5	
811310	Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance	7.5	
811420	Reupholstery and Furniture Repair	7.5	
812112	Beauty Salons	7.5	
812310	Coin-Operated Laundries and Drycleaners	7.5	
812990	All Other Personal Services	7.5	
813110	Religious Organizations	7.5	
813212	Voluntary Health Organizations	27.5	
813311	Human Rights Organizations	27.5	
813319	Other Social Advocacy Organizations	7.5	
813410	Civic and Social Organizations	7.5	
813910	Business Associations	7.5	
813920	Professional Organizations	15	
813990	Other Similar Organizations (except Business, Professional, Labor, and Political Organizations)	7.5	
921190	Other General Government Support	No SBA Size Standards[43]	
922120	Police Protection	No SBA Size Standards[44]	
923120	Administration of Public Health Programs	No SBA Size Standards[45]	
925120	Administration of Urban Planning and Community and Rural Development	No SBA Size Standards[46]	
926140	Regulation of Agricultural Marketing and Commodities	No SBA Size Standards[47]	

[43] NAICS Sector 92 – Small business size standards are not established for this sector. Establishments in the Public Administration sector are Federal, State, and local government agencies which administer and oversee government programs and activities that are not performed by private establishments. Concerns performing operational services for the administration of a government program are classified under the NAICS private sector industry based on the activities performed. Similarly, procurements for these types of services are classified under the NAICS private sector industry that best describes the activities to be performed. For example, if a government agency issues a procurement for law enforcement services, the requirement would be classified using one of the NAICS industry codes under NAICS industry 56161, Investigation, Guard, and Armored Car Services.
[44] Ibid.
[45] Ibid.
[46] Ibid.
[47] Ibid.

NAICS Codes	NAICS Industry Description	Size standards in millions of dollars ($)	Size standards in number of employees
926150	Regulation, Licensing, and Inspection of Miscellaneous Commercial Sectors	No SBA Size Standards[48]	

[48] Ibid.

Appendix B: Form I-129 Sample with Petition Totals

Sample ID	Petitions
1	2
2	1
3	1
4	1
5	1
6	1
7	1
8	4
9	17
10	1
11	115
12	2
13	14
14	2
15	8
16	2
17	3
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19	3
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21	1
22	1
23	1
24	1
25	4
26	1
27	1
28	1
29	1
30	1
31	1
32	2
33	1
34	1
35	1
36	83
37	1

38	1
39	2
40	1
41	2
42	1
43	1
44	4
45	13
46	1
47	4
48	1
49	2
50	1
51	2
52	2
53	1
54	1
55	1
56	2
57	4
58	1
59	23
60	6
61	1
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63	1
64	1
65	1
66	9
67	2
68	1
69	1
70	1
71	9
72	1
73	34
74	1
75	3
76	3
77	2
78	1

79	1
80	1
81	3
82	2
83	4
84	1
85	29
86	1
87	1
88	1
89	1
90	1
91	2
92	1
93	1
94	1
95	1
96	1
97	2
98	38
99	1
100	1
101	2
102	16
103	2
104	83
105	10
106	1
107	1
108	1
109	2
110	1
111	1
112	1
113	1
114	1
115	1
116	1
117	3
118	1
119	1

120	4
121	1
122	1
123	1
124	2
125	10
126	1
127	25
128	1
129	1
130	1
131	1
132	1
133	1
134	1
135	3
136	5
137	1
138	1
139	1
140	43
141	1
142	1
143	13
144	1
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146	1
147	8
148	1
149	10
150	2
151	3
152	1
153	1
154	1
155	1
156	1
157	1
158	3
159	1
160	1

161	1
162	1
163	2
164	1
165	1
166	1
167	1
168	1
169	1
170	1
171	2
172	1
173	1
174	3
175	4
176	1
177	3
178	3
179	2
180	1
181	1
182	1
183	1
184	1
185	1
186	1
187	4
188	1
189	1
190	2
191	3
192	1
193	1
194	1
195	1
196	1
197	1
198	1
199	1
200	2
201	1

202	1
203	2
204	1
205	1
206	1
207	1
208	2
209	3
210	1
211	2
212	1
213	1
214	1
215	1
216	3
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221	1
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223	1
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229	2
230	1
231	1
232	1
233	4
234	1
235	1
236	1
237	1
238	1
239	1
240	18
241	1
242	1

243	2
244	1
245	2
246	1
247	8
248	1
249	1
250	7
251	1
252	1
253	2
254	1
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269	1
270	1
271	1
272	1
273	1
274	7
275	1
276	4
277	3
278	1
279	2
280	1
281	1
282	22
283	5

284	1
285	3
286	12
287	1
288	1
289	2
290	1
291	1
292	1
293	1
294	1
295	1
296	1
297	1
298	4
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311	1
312	1
313	18
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315	1
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319	1
320	3
321	2
322	1
323	1
324	2

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326	1
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329	1
330	1
331	1
332	1
333	1
334	1
335	1
336	1
337	6
338	3
339	1
340	2
341	2
342	2
343	1
344	6
345	1
346	1
347	1
348	2
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354	1
355	1
356	1
357	1
358	2
359	1
360	3
361	5
362	2
363	2
364	2
365	3

366	1
367	1
368	24
369	1
370	1
371	1
372	1
373	1
374	2
375	1
376	1
377	1
378	1
379	1
380	5
381	1
382	3
383	1
384	1
385	1
386	2
387	1
388	2
389	1
390	1
391	1
392	1
393	2
394	4
395	2
396	2
397	50
398	1
399	1
400	4
401	1
402	2
403	2
404	1
405	1
406	1

407	16
408	4
409	1
410	1
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412	1
413	1
414	1
415	1
416	1
417	1
418	2
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422	1
423	1
424	1
425	14
426	9
427	6
428	6
429	2
430	1
431	1
432	2
433	10
434	1
435	2
436	1
437	1
438	1
439	1
440	2
441	7
442	1
443	1
444	1
445	7
446	1
447	1

448	1
449	1
450	1
451	2
452	7
453	5
454	8
455	1
456	1
457	1
458	2
459	55
460	3
461	3
462	4
463	6
464	127
465	9
466	1
467	4
468	35
469	1
470	1
471	1
472	1
473	1
474	3
475	7
476	1
477	1
478	2
479	6
480	2
481	2
482	1
483	1
484	3
485	2
486	12
487	1
488	1

489	1
490	1
491	1
492	1
493	4
494	1
495	1
496	24
497	2
498	3
499	4
500	1
501	2
502	2
503	5
504	1
505	5
506	3
507	3
508	514
509	1
510	2
511	1
512	1
513	1
514	24
515	1
516	1
517	6
518	1
519	1
520	1
521	13
522	4
523	2
524	1
525	1
526	1
527	1
528	5
529	2

530	1
531	3
532	1
533	20
534	1

Appendix C: Form I-140 Sample with Petition Totals

Sample ID	Petitions
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2	1
3	1
4	1
5	24
6	14
7	1
8	1
9	1
10	5
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22	15
23	2
24	1
25	2
26	1
27	29
28	1
29	8
30	3
31	1
32	1
33	2
34	2
35	1
36	1
37	1

38	3
39	1
40	2
41	2
42	1
43	1
44	1
45	1
46	1
47	3
48	1
49	1
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55	1
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57	1
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59	1
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61	2
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65	1
66	5
67	1
68	1
69	1
70	3
71	1
72	1
73	9
74	1
75	1
76	2
77	1
78	1

79	1
80	1
81	3
82	1
83	1
84	1
85	1
86	2
87	4
88	1
89	1
90	1
91	1
92	1
93	1
94	1
95	1
96	3
97	1
98	2
99	1
100	1
101	2
102	1
103	3
104	1
105	1
106	3
107	1
108	2
109	1
110	1
111	1
112	2
113	1
114	1
115	1
116	1
117	1
118	5
119	1

120	1
121	4
122	1
123	2
124	1
125	3
126	1
127	1
128	1
129	1
130	1
131	1
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145	1
146	1
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159	2
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163	1
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169	1
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172	15
173	6
174	2
175	1
176	1
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178	1
179	2
180	2
181	1
182	1
183	2
184	2
185	4
186	1
187	3
188	1
189	2
190	1
191	1
192	1
193	13
194	20
195	1
196	1
197	1
198	5
199	4
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205	5
206	1
207	1
208	1
209	1
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211	3
212	1
213	1
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229	4
230	2
231	1
232	1
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235	1
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237	1
238	1
239	4
240	2
241	1
242	6

243	1
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245	1
246	1
247	1
248	8
249	2
250	2
251	1
252	8
253	1
254	1
255	1
256	1
257	21
258	2
259	1
260	1
261	8
262	1
263	2
264	1
265	1
266	6
267	4
268	1
269	1
270	1
271	6
272	7
273	1
274	1
275	1
276	1
277	23
278	1
279	7
280	1
281	1
282	1
283	1

284	1
285	2
286	1
287	1
288	1
289	1
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291	1
292	1
293	3
294	1
295	11
296	1
297	1
298	6
299	2
300	1
301	1
302	1
303	10
304	1
305	1
306	1
307	1
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309	1
310	12
311	1
312	1
313	1
314	2
315	1
316	1
317	1
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320	1
321	2
322	1
323	1
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326	1
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328	1
329	1
330	1
331	3
332	2
333	1
334	1
335	1
336	1
337	1
338	2
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343	1
344	3
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351	1
352	1
353	1
354	1
355	3
356	3
357	1
358	2
359	1
360	2
361	1
362	1
363	1
364	1
365	2

366	1
367	1
368	1
369	16
370	1
371	1
372	1
373	3
374	1
375	1
376	1
377	59
378	1
379	4
380	2
381	2
382	1
383	35
384	1
385	1
386	1
387	2
388	1
389	1
390	1
391	2
392	7
393	1
394	4
395	2
396	1
397	1
398	1
399	2
400	5
401	1
402	3
403	1
404	1
405	1
406	2

407	2
408	5
409	1
410	10
411	1
412	1
413	1
414	1
415	3
416	3
417	1
418	1
419	1
420	3
421	1
422	5
423	7
424	8
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426	1
427	1
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429	1
430	2
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432	1
433	1
434	1
435	4
436	14
437	1
438	1
439	1
440	1
441	1
442	1
443	1
444	1
445	6
446	1
447	1

448	4
449	1
450	11
451	2
452	1
453	1
454	1
455	4
456	1
457	2
458	1
459	1
460	1
461	1
462	1
463	1
464	1
465	1
466	1
467	1
468	1
469	1
470	1
471	1
472	2
473	1
474	1
475	1
476	1
477	1
478	1
479	1
480	1
481	3
482	1
483	1
484	1
485	1
486	1
487	1
488	1

489	14
490	5
491	1
492	2
493	1
494	1
495	1
496	1
497	2
498	2
499	1
500	3
501	2
502	1
503	1
504	1
505	1
506	2
507	1
508	1
509	1
510	2
511	2
512	1
513	1
514	29

Appendix D: Form I-910 Sample with Petition Totals

Sample ID	Petitions
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3	1
4	2
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9	1
10	1
11	1
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24	1
25	1
26	2
27	1
28	3
29	1
30	1
31	1
32	2
33	1
34	1
35	1
36	1
37	1

38	2
39	1
40	1
41	1
42	2
43	1
44	1
45	1
46	3
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